

June 24, 2005

Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

RE: Bay State Gas Company, DTE 05-27

Dear Secretary Cottrell:

On June 2, 2005, the Attorney General filed a motion for leave to conduct depositions of employees and experts of the Bay State Gas Company ("Bay State" or "Company"). In that motion, the Attorney General requested the depositions of "Bay State's Pipe Repair and Replacement manager(s)" to question them regarding "issues related to distribution system maintenance, repair and replacement." At the time the Attorney General filed the motion, the names of these individuals were not yet determined.

Through the review of discovery produced by the Company, the Attorney General seeks leave to supplement the identification of deponents with specific names of Company employees: Edward Collins (Senior Engineer / Systems Planning Engineer), Keith Dalton (Manager of Engineering) and John Nerden (Bare Steel Program). The engineers identified here should have critical information regarding the corrosion problems in the Company's distribution system, as well as knowledge regarding the Company's installation, maintenance, repair and replacement records. *See* AG-5-4. The Company has resisted the timely identification and production of corrosion related records, further adding to the need to conduct depositions in order for the Attorney General to prepare his case. G. L. c. 30A, 11.

As further information develops, the Attorney General will supplement this list.

Sincerely,

Alexander J. Cochis
Assistant Attorney General

cc. Service list